



December 30, 2021

Via email to comments-intermtn-bridger-teton@usda.gov

Yellowstone Ecosystem Subcommittee
Interagency Grizzly Bear Committee
10 East Babcock St, Room 234
Bozeman, MT 59715

Re: Proposed changes to 2016 Conservation Strategy for management of developed sites

Thank you for the opportunity to comment on the proposed changes to habitat standards in the 2016 Conservation Strategy for Greater Yellowstone Ecosystem (GYE) grizzly bears. The GYE is home to an astounding array of wildlife species, including the iconic grizzly bear. Greater Yellowstone Coalition (GYC) engages the wide range of people who care about our region to ensure the wildlife that make Greater Yellowstone unique thrive for generations to come. We have been working on grizzly bear conservation and management issues for over 35 years. GYC works as a partner and collaborator with federal and state agencies, as well as people in communities living alongside grizzly bears. Through partnerships and projects on the ground, we strive to protect core habitat, promote connectivity between grizzly bear populations, and reduce/prevent conflicts.

We have reviewed the proposed changes in the habitat standards for the Yellowstone ecosystem. We appreciate the care and detail that the Technical Team put into this revision process and the materials provided to assist in review and evaluation of these proposed changes. Careful management of developed sites in relation to the 1998 baseline has played an important role in grizzly bear recovery in the GYE. Our comments all relate to the need for greater specificity and additional conditions to ensure the proposed revisions do not undermine the original intent of developing habitat standards, while still allowing for the flexibility managers need. Our comments are outlined below:

- **Relationship to existing Forest Plans and Park Management Plans** - We ask that the Yellowstone Ecosystem Subcommittee (YES) please clarify how these proposed changes relate to existing Forest Plan standards and management plans for Yellowstone and Grand Teton National Parks. Will these changes require Forest Plan amendments or amendments to Park management plans and if so, how will those changes be implemented to assure their permanence and continued application in future management actions?
- **Polygons and level of detail parameter** - We appreciate the use of a footprint around developed sites and the rationale for the footprint approach. However, we have a few comments/questions on the footprint process. Regarding the level of detail parameter, you state on p. 6 of the highlights document that assigning a lower detail number to a polygon,

*“...yields a polygon of minimal complexity and **maximum area**”* (emphasis added). On p. 7 you state, *“...forcing footprint polygons to enclose all outlying structures, including those structures with little or no associated human presence, would yield larger footprint areas, which, in turn, **could potentially be developed in the future and thus further reduce secure habitat**”* (emphasis added).” Given this apparent interest by the technical team to minimize polygon size to limit future development possibilities inside large polygons, we wonder why all campgrounds are assigned a detail parameter of 0 in Table 1? This approach maximizes footprint size around each existing campground. We suspect that this was to allow expansion of site development opportunities inside existing campground polygons. If this is so, we suggest being explicit about this and the benefits of this approach, which include control of overnight use numbers and application of management to reduce human/bear conflicts. We certainly understand the demand that managers face for more camping opportunities with increased visitation, and we support the idea of not expanding polygons in response to this demand. We would also like to see an explicit statement in this document that the agencies do not foresee any need to “move the goalposts” in the future by changing polygon sizes or shapes.

- **Concentrating human use** - We appreciate the general approach of the changes in the habitat standards that focuses on concentrating human use in existing sites wherever possible rather than increasing the number and distribution of developed sites. This approach follows the spirit and intent of the original strategy to stick to the 1998 baseline. However, we believe it is important to recognize that even management strategies that concentrate additional use in developed areas will result in more dispersed recreational activity in areas adjacent to those developed sites. This activity can heighten potential for conflict with grizzly bears, and the impacts of recreational activity on grizzly bear habitat use remain largely unknown. We provide additional thoughts visitor use management below.
- **Allowing new road-side developments up to 300 meters from roads** - We understand the need for road pull outs and associated rest areas and picnic areas with the current and ever-increasing traffic levels in the Yellowstone ecosystem. However, we question the need for allowing 300 meters from existing roadways for these new pull-outs, new restroom/pit toilet developments and picnic areas. 300 meters is an arbitrary and considerable distance off existing roads to allow additional day-use site developments. It seems that most new day use developments can easily be accommodated within 50 meters of existing travel corridors, and if this was not possible then there should be no new day use sites considered at these locations. We request that there be a more complete explanation of why 300 meters was chosen as the blanket distance for development of new day use pull-outs, rest stops, and picnic areas. While we understand the rationale that areas immediately adjacent to roads do not provide secure habitat for grizzly bears, we also know that grizzly bears must move across road corridors throughout the GYE. Therefore, we encourage inclusion of explicit commitments to consideration of conflict potential and grizzly bear movements as a condition for development of any new day use sites. We encourage YES to more thoroughly analyze the potential impacts on grizzly bears of new day use sites in road corridors within the Primary Conservation Area (PCA).
- **Ignoring the impacts along Chief Joseph Highway** - We would like to know why Chief Joseph Highway (Hwy 296) is not considered a primary transportation corridor in this habitat standards revision process. It appears to be the only highway in the PCA not included as a Primary Transportation Corridor. This highway traverses important grizzly bear habitat in the east side of the PCA and is experiencing an increase in visitation, vehicle volume, and use. Excluding this highway excludes any limitations on roadside site developments and day use areas that are described for all other Primary Transportation Routes. What is the rationale for excluding the

Chief Joseph Highway? Given increases in use and traffic volume, why did the Technical Team not revise the habitat standards to include this highway and apply site development limits to the habitat along this highway for the long-term benefit of grizzly bears?

- **Dispersed overnight campsites** - The previous version of the habitat standards included language about consolidation and/or elimination of dispersed campsites as adequate mitigation for increased human capacity at developed campgrounds. This language was deleted in the proposed revision (p. 16 of proposed CS habitat changes). We assume this is due to the allowance of additional campsites inside the PCA within developed site polygons if there is no expansion beyond the polygon boundary. However, the revision reduces or eliminates any commitment to address dispersed site overnight use reductions. Dispersed campsites have the potential to be significant sources of attractants and human/bear conflicts and can become de facto human use areas without management guidelines that restrict use in some way. The revision allows modification of, *“Points for which there is no mapped polygon/footprint... to reduce resource damage detrimental environmental impacts, and or the potential for grizzly bear conflicts...”* by installing vaulted toilets and bear-resistant storage structures. The effect of this change will institutionalize dispersed overnight camping along roads, particularly in National Forests and allow such sites to be developed with toilets, bear-proof storage structures, and parking site expansion separate from the limitations built into the polygon approach. There is now apparently no limit to development of additional dispersed overnight campsites if such development occurs anywhere except along Primary Transportation Corridors. This change is particularly concerning since many roads through National Forest lands within the PCA such as the Chief Joseph Highway are not delineated as “primary transportation corridors” where new site developments are limited to no more than 10% of the existing mapped primary road corridor. Given the pressure of ongoing additional visitation and limits on overnight capacity, there will be increased pressure for dispersed site overnight use. We recognize the challenges facing management agencies to limit dispersed site camping, but this revision essentially allows increased dispersed site camping within the PCA on National Forest lands without limitations if such overnight use is not along primary road corridors. We request that the agencies provide a better approach to management of dispersed site overnight use on National Forest lands within the PCA, particularly along Hwy 296 and associated roads on National Forest lands.
- **The need to manage visitor use.** We are increasingly concerned with the level of human visitation in the Yellowstone ecosystem. The increase in visitors and the resulting demand for increases in visitor services is pushing the limits of grizzly bear management and conflict prevention and straining other resources in the ecosystem. The revisions of the habitat standards in the Conservation Strategy are a response to this increasing demand, however we believe that managers are fast approaching their limits for creative ways to accommodate increased visitor use while maintaining the unique characteristics of the Yellowstone ecosystem that attracts visitors in the first place. We are increasingly concerned that if this visitation is allowed to continue to grow unchecked, that managers will again need to consider “moving the goalposts” of careful resource management standards to accommodate such visitor levels. We do not want to see another habitat revision to the grizzly Bear Conservation Strategy that seeks to further dilute habitat protections to respond to more visitor use. GYC supports the development of a comprehensive visitor management strategy that recognizes that the ability to accommodate visitor use without detrimentally impacting wildlife like grizzly bears is finite. The future of grizzly bears in the GYE and that of many other valued natural resources depends on a recognition that we must somehow limit visitation. Visitor impacts are consumptive of many resources such as secure habitat, solitude, petroleum resources, and waste management systems, just to name a few examples. Wildlife are impacted by increasing visitor use and visitor

wildlife viewing. Wildlife viewing, if it is not managed very carefully, can and will be detrimental to natural behavior and movements. Allowing visitor use to push resource management beyond its limits will detract from the quality of the Yellowstone Ecosystem and visitor experience. We believe that we are currently at those limits and encourage further consideration of visitor management strategies alongside this effort to alter habitat standards.

- **The need for enhanced visitor education and enforcement.** GYC suggests an additional section in these habitat standard revisions that details enhanced outreach and education to visitors about the importance of proper sanitation and visitor behavior to the continued health of wildlife populations, particularly grizzly bears. Such education could include information on why campground and developed site standards exist and how visitors can become partners in the process of providing for the needs of grizzly bears and other wildlife. While National Parks currently provide educational materials at entrance stations, we suggest additional thought be given to strategies for providing messages to visitors about habitat security, the impacts of intense wildlife viewing, and the consequences of feeding or approaching wildlife as we have seen in GTNP and the Jackson, Wyoming area with Bear 399. Educational material could be provided in campgrounds, picnic areas, and toilet pull-outs within and outside the Parks about how to behave around wildlife. Accommodating increasing visitation will require additional bear management teams to educate visitors at bear jams and minimize conflicts along roadways within and outside National Parks. We encourage YES to explore opportunities for partnership with NGOs to support this sort of agency capacity.

Thank you for the opportunity to comment on these habitat revisions.

Sincerely,

Brooke Shifrin
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Greater Yellowstone Coalition